

WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT

2015-2017 MOA

ELEMENT 3 - NARRATIVE

ASSURANCES AND REVIEW OF CONTRACTS AND AGREEMENTS

Wisconsin recipients of Workforce Investment Act (WIA) – Workforce Innovation and Opportunity Act of 2014 (WIOA) funded under Title I are provided with the WIA Policy Manual. The Manual, hereinafter, referred to as the Workforce Programs Guide, provides guidance on Division of Employment and Training (DET) policy. The Manual applies to all grantees receiving WIA - WIOA Title 1 funds no matter whether funds are extended directly or indirectly from DET. Grantees and sub-grantees are required to establish written policies and procedures to comply with all applicable portions of the Guide. The selection of the DET WIA Policy Manual Guide addressing the specific Nondiscrimination requirements is found in the “Assurances and Certifications”, see Exhibit 3-A, Chapter 7 Section C pages 1 - 4. To view the electronic version, follow the web link below to Chapter 7 Section C pages 1-4, are found electronically on pages 100-102: http://dwd.wisconsin.gov/dwd/publications/dws/pdf/detw_17244_p.pdf

In addition to carrying out the terms of a grant, each grantee assures that it will comply with any and all applicable laws, rules and regulations and with the provisions of its grant agreement. Grantees must provide assurances that they will not discriminate on the bases of all the protected groups covered under all civil rights laws and follow equal employment opportunity practices, administration of programs, or in the manner in which services are delivered, including benefits issued to eligible participants and applicants of programs. The Guide provides the specific nondiscrimination assurance language and requirements that all grants, contracts, and notices must contain when Federal assistance is extended to other sub-grantees. DETs boilerplate contract language is compliant with 29 CFR 37.20. Each WDA has adopted the required assurance language, either in its entirety or as a reference as required by the regulations. Although some local entities have developed their own contract language, the nondiscrimination provisions and assurances mirror DET requirements. .

The WDBs have authority for securing and approving certified training providers. Currently, local training providers submit paper applications to the WDBs, which describe the type of program, course synopsis, location, costs, and other relevant information for approval by the local WDBs. After local approval of the training provider, all relevant information is then sent to DWD for compiling the statewide listing.

WDBs are required to notify all sub-grantees under contract or agreement, of the terms, conditions, and potential consequences for noncompliance and abide by all nondiscrimination laws applicable to employment and services delivery. These include; ensuring that persons with disabilities are afforded equal access and equal opportunity to all programs, services, and activities through the provision of auxiliary aids, accommodations, physical access to facilities, as well as accurate and meaningful communication through oral language interpreters and/or translations of vital documents consistent with DET and DOL Limited English Proficiency (LEP) Guidance.

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The State is fully committed to maintain and improving upon its civil rights compliance program by assuring our compliance and those of our Federally funded grantees and sub-grantees with all provisions of nondiscrimination and equal opportunity. The State continues to monitor its policies on WIA Title I nondiscrimination and equal opportunity matters by developing, implement, revising, and publishing new provisions in a timely manner.

The Division recently updated its LEP Plan. A copy of the updated LEP Plan covering the period of January 1, 2015 through December 31, 2017 is included in Tab 2 Element 1 Exhibit 1-P.